

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
(Alexandria Division)

In re:	)	Case No. 22-11964
	)	(Chapter 11)
KTS SOLUTIONS, INC.	)	
	)	SubChapter V
Debtor.	)	

**NOTICE OF HEARING AND NOTICE OF FIRST DAY MOTIONS**

PLEASE TAKE NOTICE that KTS Solutions, Inc. (the “Debtor”) has filed

- (1) *Emergency Motion for Authorization to Pay Certain Prepetition (i) Wages, Salaries and Other Compensation, (ii) Employee Medical and Similar Benefits, and (iii) Other Miscellaneous Employee Expenses and Benefits* (the “Wages Motion”);
- (2) *Expedited Motion For The Entry Of Interim And Final Orders Pursuant To Section 364 Of The Bankruptcy Code (A) Authorizing The Debtor To Obtain Post Petition Financing On An Interim And Final Basis (B) Granting Security Interests And Priority Claims, (C) Providing Adequate Protection (D) Authorizing Debtor To Enter Into Agreements With Action Capital Corporation And (E) Scheduling A Final Hearing On The Motion Pursuant To Bankruptcy Rule 4001(C)* (the “Financing Motion”);
- (3) *Expedited Motion For Entry of an Order Authorizing Debtor to Continue Insurance Premium Finance Program and Pay Insurance Premium Financing Obligations Therefrom* (the “Insurance Motion”); and
- (4) *Debtor’s Motion for Entry of Interim Order Authorizing Use Cash Collateral and Granting Adequate Protection Pursuant to 11 U.S.C. §§ 361 and 363 and Scheduling Final Hearing* (the “Cash Collateral Motion”)

The Wages Motion, the Financing Motion, the Insurance Motion and the Cash Collateral Motion are collectively referred to as the “First Day Motions.” The First Day motions are enclosed. The Court has scheduled a hearing on the Wages Motion on Tuesday, December 13, 2022 at 1:30 pm via Zoom. The remainder of the First Day Motions were filed after business hours, but the Debtor has also requested that they be heard Tuesday, December 13, 2022 at 1:30 pm via Zoom.

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*Proposed Counsel to KTS Solutions, Inc.*

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)** Under Local Bankruptcy Rule 9013-1, the Court may deem any opposition waived, treat the First Day Motions as conceded, and issue an order granting the requested relief without further notice or hearing unless you take the followings steps:

1. You must also attend a hearing on **December 13, 2022 at 1:30 p.m. (the “Hearing”)** in the United States Bankruptcy Court for the Eastern District of Virginia, **before the Honorable Brian F. Kenney**, 200 S. Washington St., Alexandria, Virginia. Parties wishing to participate in hearings via Zoom for Government must transmit, via e-mail, a completed PDF-fillable request form, found at <https://www.vaeb.uscourts.gov/sites/vaeb/files/ZoomRegistration.pdf> to [EDVABK-ZOOM-Judge\\_Kenney@vaeb.uscourts.gov](mailto:EDVABK-ZOOM-Judge_Kenney@vaeb.uscourts.gov).

2. Written objections have been waived. Any objections may be made orally at the hearing.

If you or your attorneys do not take these steps, the Court may deem any opposition waived, treat the First Day Motions as conceded, and issue an order granting the requested relief without further notice or hearing.

Dated: December 9, 2022

Respectfully submitted,

/s/ Justin P. Fasano  
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### **CERTIFICATE OF SERVICE**

I hereby certify that on December 9, 2022, I caused a copy of the foregoing as set forth on the global certificate of service to be filed.

/s/ Justin P. Fasano  
Justin P. Fasano

